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11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16) Chapter 11
and)
17) (Lead Case–Jointly Administered)
18 PACIFIC GAS AND ELECTRIC)
COMPANY)
19 Debtors) **MOTION FOR ORDER**
20) **AUTHORIZING WITHDRAWAL OF**
Affects:) **COUNSEL TO CHERISH CRAM**
21)
22 ☐ PG&E Corporation)
23 ☐ Pacific Gas & Electric Company)
24 ☒ Both Debtors)
25 * All papers shall be filed in the Lead)
Case, No. 19-30088 (DM).)
26)

1 Robins Cloud LP (“Firm”), counsel of record¹ for creditor, Cherish Cram (“Creditor”),
2 respectfully submits this Motion for Order Authorizing Withdrawal of Counsel (“Motion”) pursuant to
3 Rules 1001-2, 9013-1, 9013-2, 9013-3 and 9014 of the Bankruptcy Court’s Local Rules.

4 In support of this Motion, the Firm represents as follows:

5 **1. Relevant Facts**

6 **a. General Background**

7 In January 2019, the Debtors filed voluntary Chapter 11 petitions, commencing these cases.
8 Dkt. No. 1; Bryson Decl. ¶4.

9 Initially, the Court set a claims bar of October 21, 2019. Dkt. No. 2806. The claims bar date was
10 extended to December 31, 2019, to allow certain fire victims additional time to file claims against the
11 Debtors. Dkt. No. 4651.

12 Jointly, the Debtors proposed a chapter 11 plan of reorganization that, among other things,
13 channeled all fire victim claims to the Fire Victim Trust (“Plan”). Dkt. No. 8048. On June 20, 2020, the
14 Court entered an order confirming Debtors’ Plan. Dkt. No. 8053.

15 **b. Creditor’s Refusal to Communicate and Provide Necessary**
16 **Information to the Firm**

17 On October 16, 2019, the Firm filed Proof of Claim No. 28309 on behalf of Cherish Cram
18 (“Claim”), seeking damages from the Paradise Fire. Since the filing of the Claim, an irreconcilable
19 difference has developed between Creditor and the Firm. As a result, the Firm notified Creditor that it
20 must withdraw as counsel. Bryson Decl. ¶5. Based on these circumstances, good cause exists for the
21 Court to enter an order relieving the Firm as counsel of record for Creditor.

22 **2. Argument**

23 Pursuant to Rule 11-5 (a) of the Local Civil Rules in force in the Northern District of
24 California, “counsel may not withdraw from an action until relieved by order of Court after written
25 notice has been given reasonably in advance to the client and to all other parties who have appeared in
26

27 ¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. (“GLG”) to, among other things, assist it in
28 filing this motion. GLG has no contractual or attorney/client relationship with Creditor. Declaration of
Robert Bryson in Support of Motion for Order Authorizing Withdrawal of Counsel (“Bryson Decl.”),
¶2, fn.1.

1 the case.”

2 Furthermore, California’s professional ethics Standing Committee has opined that when
3 seeking leave of court to withdraw as counsel, it will “ordinarily...be sufficient [for an attorney] to say
4 only words to the effect that ethical considerations require withdrawal or that there has been an
5 irreconcilable breakdown in the attorney-client relationship.” Formal Opinion No. 2015-192.

6 In the case at bar, an irreconcilable breakdown of the attorney-client relationship has arisen.
7 This constitutes good cause for the Court to grant leave for the Firm to withdraw as counsel of record.


8 To the extent that Creditor requests that the Firm turn over any files or information to which
9 Creditor is entitled, the Firm will cooperate and transmit such files. Bryson Decl., ¶6.

10 **3. Conclusion**


11 For the foregoing reasons and for the reasons set forth in the Declaration of Robert Bryson,
12 submitted in support of this Motion, the Firm respectfully requests that the Court enter an Order
13 granting the Firm leave to withdraw as counsel of record for Creditor.

14 DATED: August 27, 2022

ROBINS CLOUD LLP

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16 
17 ROBERT BRYSON
Attorneys for Creditor, Cherish Cram

18 GRIMSHAW LAW GROUP, P.C.

19 
20 MATTHEW W. GRIMSHAW
21 Counsel for Robins Cloud LLP